

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(DBP/USPS-137(a-l) and (p-t))

The United States Postal Service hereby files its responses to the following
interrogatories of David Popkin: DBP/USPS-137(a-l) and (p-t), filed on December 17,
2001.

Each interrogatory is stated verbatim and is followed by the response.

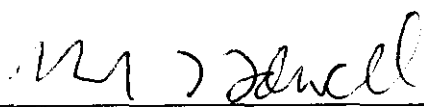
Objections to DBP/USPS-137(m-o) were filed on December 26, 2001.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 23, 2002

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DBP/USPS-137 Please refer to your response to DBP/USPS-110. Your response misinterpreted the interrogatory. The question was not how South Florida arrived at being a 2-day standard and Miami arrived at being a 3-day standard. You have indicated that the mail from both South Florida and Miami and destined to the Columbia SC ADC is merged at the Miami AMC. You have also indicated that the mail is commingled at and flown from the Miami AMC to Columbia SC. For purposes of this interrogatory, assume that we are referring to mail which originates in the South Florida and Miami P&DC areas on a Monday of a no-holiday week and is destined for the Columbia SC ADC.

- [a] Confirm that the mail from both P&DCs will arrive at the Miami AMC on Monday night and/or Tuesday morning. Provide the normal arriving times for mail from each of the facilities.
- [b] Is there any external indication on the mail containers as to the scheduled delivery day for the mail. If so, provide details and copies of a sample label.
- [c] Does the mail from the South Florida P&DC normally fly on the same flights as the mail from the Miami P&DC? If not, provide an estimate of the percentage of time that the mail from both P&DCs will fly together.
- [d] Describe any efforts, if any, that are made at the Miami AMC to dispatch the South Florida P&DC mail prior to the mail from the Miami P&DC.
- [e] Confirm that the mail from the South Florida P&DC is scheduled for delivery on Wednesday.
- [f] Confirm that the mail from the Miami P&DC is scheduled for delivery on Thursday.
- [g] Confirm that the mail from both the South Florida and Miami P&DCs will arrive at the Columbia AMC/AMF.
- [h] Describe any efforts, if any, that are made at the Columbia AMC/AMF to dispatch to the Columbia ADC the mail arriving from the South Florida P&DC mail prior to the mail arriving from the Miami P&DC.
- [i] Confirm that the Columbia ADC is co-located at the Columbia P&DC and is located some distance from the Columbia AMC/AMF such that separate transportation is required.
- [j] Does the mail that originated at the South Florida P&DC normally travel on the same transportation from the Columbia AMC/AMF to the Columbia ADC as the mail that originated at the Miami P&DC? If not, provide an estimate of the percentage of time that the mail from both P&DCs will be transported together.

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DBP/USPS-137 (continued):

- [k] Describe any efforts, if any, that are made at the Columbia ADC to process the mail arriving from the South Florida P&DC mail prior to the mail arriving from the Miami P&DC.
- [l] *Is there any internal or external indication on or in the mail containers as to the scheduled delivery day for the mail. If so, provide details as well as copies of a sample label.*
- [m] Please advise the percentage of mail originating at the South Florida P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for.
- [n] Please advise the percentage of mail originating at the Miami P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for.
- [o] Please provide a comparison between the percentage of mail originating at the South Florida P&DC that was delivered to addressees in the Columbia SC ADC area in two days or less during the most recent three-month period of time that the data is available for vs. the percentage for mail that originated at the Miami P&DC in the same time period.
- [p] How it is possible to explain that mail between the Miami P&DC and the Columbia ADC is receiving expeditious handling and transportation when compared to mail between the South Florida P&DC and the Columbia ADC since both travel together and the mail from the South Florida P&DC has a scheduled delivery date one day earlier?
- [q] Confirm that it is possible to achieve 2-day delivery standards for mail originating at the Miami P&DC and destined for the Columbia SC ADC as easily as it is to achieve 2-day delivery standards for mail originating at the South Florida P&DC and destined for the Columbia SC ADC.
- [r] Confirm that even though the mail destined for the Columbia SC ADC from the South Florida and Miami P&DCs will be merged at the Miami AMC and travel together from that point on by air transportation to the Columbia AMC/AMF, the mail from the South Florida P&DC will have a delivery standard of two days because it has a highway drive time of 12.049 hours or less while the mail from the Miami P&DC will have a delivery standard of three days because it has a highway drive time of greater than 12.049 hours.
- [s] Please explain how the condition described subpart [r] can be perceived as expeditious handling and transportation.

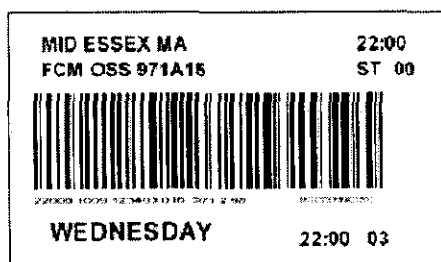
DBP/USPS-137 (continued):

RESPONSE:

- South Florida has a 2-Day CT of 01:45. Trip 33050-5 departs South Florida at 02:45, arrives at AMC MIA at 03:15 Tuesday morning. From Miami AMC, they usually use DL 1539 departing 06:50 into Atlanta arriving at 08:46. The mail transfers at Atlanta to DL-1006 departing at 11:50 and arriving in Columbia SC (CAE) at 12:39. After receiving the mail from the airlines, the mail should be ready for transportation on 290VS-1520 departing the AMC at 15:20 and arriving at Columbia ADC at 15:40.

Miami FL 331 has a 3-Day CT of 04:30. Trip 331VS1063 departs Miami at 04:45, arrives at AMC MIA at 05:00 Tuesday morning. From Miami AMC, they target DL-2246 into Atlanta departing at 08:25 and arriving Atlanta at 10:14. From Atlanta, they connect to DL-1707 departing at 14:40 and arriving at 15:31 in Columbia SC. After receiving the mail from the airlines, the mail should be ready for transportation on 290VS-ND departing the AMC at 21:35 and arriving at Columbia ADC at 21:50.

- (b) Yes, the scheduled delivery day of the week, based on the respective Service Standard, is printed on the destination label, as indicated by the following example:



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RESPONSE to DBP/USPS-137 (continued):

- (c) Apparently, the mail will not normally fly together on the same flight. It is unknown how often it may do so and there are insufficient data upon which to base an estimate of how frequently it may do so.
- (d) When 2 items of mail are received, one with a Wednesday standard, and one with a Thursday standard, the AMC operation gives priority treatment to the mail with the Wednesday Service Standard.
- (e-g) Confirmed.
- (h) When 2 items of mail are received, one with a Wednesday standard, and one with a Thursday standard, the AMC operation gives priority treatment to the mail with the Wednesday Service Standard.
- (i) Confirmed.
- (j) Apparently, the mail will not normally travel together. It is unknown how often it may do so and there are insufficient data upon which to base an estimate of how frequently it may do so.
- (k) When 2 items of mail are received, one with a Wednesday standard, and one with a Thursday standard, the AMC operation gives priority treatment to the mail with the Wednesday Service Standard.

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RESPONSE to DBP/USPS-137 (continued):

- (l) Please see the above response to subpart (b).
- (m-o) Objections filed.
- (p) Prior to the changes made in FY-00/01, the Service Standard from both Miami P&DC and South Florida P&DC was 3-Days. In an effort to extend 2-Day reach, by expanding the surface Transportation Network, the result was that one office qualified and the other did not. Rather than leave them both 3-day, the Postal Service moved one of them to 2-day. Additionally, the fact that, at this point, they are both using air transportation does not mean that they will continue to do so in the future. Please also see the response to DBP/USPS-100(a).
- (q) This cannot be confirmed. Based on the Service Standard Model, mail dispatched from Miami will not reach the Columbia ADC at an acceptable time in order to achieve 2-Day delivery on a consistent basis.
- (r) Although the mail in question may, or may not, be "merged" at Miami AMC, it can be confirmed that the drive time was the determining factor for upgrading the Service Standard from 3-Days to 2-Days for the mail from South Florida P&DC, and that the mail from Miami P&DC did not meet the qualification.

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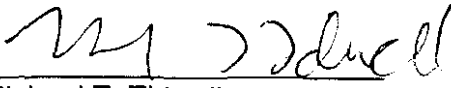
RESPONSE to DBP/USPS-137 (continued):

- (s) Please see the responses to subparts (p) and (r). The conditions described in those responses can be perceived as part of a system of expeditious handling and transportation if one judges the system as a whole and recognizes that whenever lines have to be drawn, there will always be close cases, and concedes that a reasonable and rational process produced the existing Service Standards . In this particular case, the Postal Service upgraded South Florida P&DC to ADC Columbia from a 3-day to a 2-day Service Standard. It should not be forgotten that the Service Standard changes at issue in this proceeding result in more 3-Digit ZIP Code pairs and delivery points being subject to a 2-day Service Standard.

- (t) N/A

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.


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January 23, 2001
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